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9 *Attorneys for Fire Victim Trustee*

10
11 **UNITED STATES BANKRUPTCY COURT**
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

12
13 In re:

14 **PG&E CORPORATION,**

15 **- and -**

16 **PACIFIC GAS AND ELECTRIC COMPANY,**
17 **Debtors.**

18 Affects PG&E Corporation
19 Affects Pacific Gas and Electric Company
 Affects both Debtors

20 * *All papers shall be filed in the Lead Case,*
21 *No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**FIRE VICTIM TRUST'S
SUPPLEMENTAL NOTICE
REGARDING SETTLEMENT
WITH CERTAIN VEGETATION
DEFENDANTS**

[Relates to Docket Number 12682]

1 TO FIRE VICTIMS AND ALL OTHER INTERESTED PARTIES:

2 PLEASE TAKE NOTICE that, as previously disclosed, the Fire Victim Trust (the “Trust”)
3 has settled claims (the “Assigned Claims”) against Western Environmental Consultants, LLC,
4 ArborMetrics Solutions, LLC, Trees, LLC, and Utility Tree Service, LLC (the “Settling
5 Vegetation Defendants”) that the Trust held as part of the Assigned Rights and Causes of Action
6 transferred to the Trust pursuant to the *Debtors’ and Shareholder Proponents’ Joint Chapter 11*
7 *Plan of Reorganization dated June 19, 2020* [Dkt. No. 8048]. The Trust previously filed an
8 unredacted copy of the settlement and release agreement by and among the Trustee and the Settling
9 Vegetation Defendants (the “Settlement Agreement”) [Dkt. No. 13607, Ex. 1] and posted the
10 Settlement Agreement on the Fire Victim Trust Website at www.firevictimtrust.com. The
11 Settlement Agreement provides, *inter alia*, for the Settling Vegetation Defendants to remit to the
12 Trust the total lump sum of one hundred seventy-one million dollars (\$171,000,000.00) (the
13 “Settlement Amount”) and for mutual releases between the parties to the Settlement Agreement.

14 PLEASE TAKE FURTHER NOTICE that the Trust previously filed a redacted¹ copy of the
15 engagement letter (the “VM Firms’ Engagement Letter”) [Dkt. No. 13607, Ex. 2] effective
16 January 27, 2021, between the Trust and the firms Cotchett, Pitre & McCarthy, LLP, Corey,
17 Luzach, de Ghetaldi & Riddle, LLP, Walkup, Melodia, Kelly & Schoenberger, Dreyer, Babich,
18 Buccola, Wood & Campora, LLP, Andrews & Thornton, A Law Corporation, and Greenberg Gross
19 LLP (together, “VM Firms”) in connection with the Assigned Claims and posted the VM Firms’
20 Engagement Letter on the Fire Victim Trust Website at www.firevictimtrust.com. Pursuant to the
21 VM Firms’ Engagement Letter, the VM Firms shall be entitled to attorneys’ fees as specified in the
22 VM Firms’ Engagement Letter.

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25 ¹ The VM Firms’ Engagement Letter remains redacted in accordance with the *Order Granting Motion of the Fire*
26 *Victim Trustee to File Redacted Versions of Certain Retention Agreements Until Litigation Related to Such Retention*
27 *Agreements is Finally Resolved* [Dkt. No. 12884], which provides, among other things, that the unredacted copy of the
28 retention agreement is confidential, shall remain under seal, and shall not be made available to anyone without the
express written consent of the Trustee or order of the Court until such time as the litigation to which the retention
agreement applies has been finally resolved by judgment, arbitration, mediation, or otherwise. The litigation to which
the VM Firms’ Engagement Letter applies has not yet been finally resolved with respect to certain other entities.

1 PLEASE TAKE FURTHER NOTICE that, having performed an accounting to determine
2 its costs, expenses, and attorneys' fees incurred in connection with the Assigned Claims, the Trust
3 files this supplemental notice to provide the following further disclosures: the gross amount
4 realized was \$171,000,000.00; costs and expenses totaled \$2,659,338.99; attorneys' fees totaled
5 \$37,034,945.42; and the net benefit to the Trust was \$131,305,715.59, as detailed in the following
6 table:

Settlement Distribution		
Gross Settlement Recovery		\$171,000,000.00
Minus Expenses		\$2,659,338.99
Deposition Vendor	\$50,803.86	
Electronic Database/Discovery Platform	\$897,761.92	
Consultant for Electronic Database/Discovery Platform	\$10,175.00	
Physical Evidence Storage	\$925,023.17	
Witness Fees	\$22,648.17	
Miscellaneous Discovery	\$3,300.91	
Arborists	\$97,505.25	
Videographer	\$18,766.10	
Financial Advisors	\$228,350.50	
Environmental Consultant	\$46,684.50	
Damages Analyst	\$500.00	
Insurance Counsel	\$274,559.88	
Mediators	\$49,918.75	
Court Costs	\$12,250.16	
Travel	\$20,365.15	
Miscellaneous	\$725.67	
TOTAL	\$2,659,338.99	
Net Proceeds		\$168,340,661.02
Minus Attorneys' Fees		\$37,034,945.42
Distribution to Trust		\$131,305,715.59

1 DATED: June 6, 2023

BROWN RUDNICK LLP

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